



Writer's Direct Dial: (516) 663-6515
Writer's Direct Fax: (516) 663-6715
Writer's E-Mail: emurray@rmfpc.com

April 29, 2022

By ECF

Honorable Andrew E. Krause
United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: Doherty v. Bice, et al., 18 Civ. 10898 (NSR)(AEK)

Dear Judge Krause:

I am a partner in Ruskin Moscou Faltischek, P.C., attorney for plaintiff. I am writing to request a two-week extension for plaintiff to identify its expert witness and provide a description of the planned testimony. Counsel for defendants have consented to this request.

Pursuant to the current discovery order, plaintiff is required to identify any expert and provide a general description of testimony by April 29, 2022. Plaintiff's expert disclosure pursuant to Rule 26(a)(2) is required to be made by May 27, 2022 and defendants' expert disclosure by June 24, 2022. All expert discovery, including expert depositions, is then required to be completed by July 19, 2022.

Plaintiff requests a two-week extension of the above dates so that his initial disclosure would be required by May 13, 2022, plaintiff's full disclosure by June 3, 2022, defendants' disclosure by July 8, 2022 and expert discovery completed by August 2, 2022.

The request is necessary, in part, because plaintiff's initial expert turned out to have a conflict, and plaintiff is required to retain a new expert.

Respectfully,

E. Christopher Murray
For the Firm

ECM/dp

972466